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October 8, 2021

By ECF

The Honorable Claire C. Cecchi, U.S.D.J.
United States District Court
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: In re Ex Parte Application of JSC United Chemical Company Uralchem
2:20-cv-3651-CCC-MF

Dear Judge Cecchi:

On behalf of JSC United Chemical Company Uralchem (“Uralchem”), we respond to non-party Lawton Lane Chemical Inc.’s request for (i) a 90-day extension to oppose Uralchem’s amended 28 U.S.C. § 1782 application; and (ii) leave to file a surreply. Dkt. 38.

Uralchem’s proposed 60-day extension (without surreply) is an appropriate balance of the parties’ interests. Uralchem’s past extension to prepare the amended application was necessary to consider the merits of a potential appeal and to assemble the new materials in support of the amended application. Lawton now need not address any appellate issues, and it has the benefit of the evidence supplied in the amended application. Further, as the court in the Irish proceedings indicated in July that it will imminently deny the jurisdictional challenge to those proceedings, further delay in the use of the documents sought here would seriously prejudice Uralchem in its defense of a pending multi-billion dollar claim there.

Finally, given the extensive past briefing, a sur-reply is not merited.

Respectfully,

BEVELOCK & FISHER LLC

s/ Gregory J. Bevelock
Gregory J. Bevelock

c : All Counsel of Record (by ECF)